

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

JENNIFER VANDERSTOK, *et al.*,)
Plaintiffs,)
v.)
MERRICK GARLAND, in his official)
capacity as Attorney General of the United)
States, *et al.*,)
Defendants.)

Civil Action No.
4:22-cv-00691-O

[PROPOSED] SCHEDULING ORDER

The Court hereby **ORDERS** the following schedule pursuant to Plaintiff Polymer80, Inc.'s challenges involving judicial review of agency actions under the Administrative Procedure Act:

I. CRITICAL DATES

Timeline to Amend Pleadings	Within 14 days of entry of this Order Motions for leave to amend due within 21 days of Defendants' answer to amended complaint, if any
Lodging of the Administrative Record(s)	Within 45 days of entry of this Order
Discovery Related Motions (e.g., Motions to Supplement the Administrative Record)	Within 21 days of the lodging of the Administrative Record
Dispositive Motions (Staggered)	Plaintiff's Motion for Summary Judgment due within 60 days of completion of the Administrative Record (including resolution of related motions to supplement the record)

	Defendants' Response & Cross-Motion for Summary Judgment due within 45 days after Plaintiff's Motion is filed
	Plaintiffs' Reply & Response to Cross-Motion due within 21 days after Defendants' Response and Cross-Motion
	Defendants' Reply due within 21 days after Plaintiff's Reply & Response is filed
	All other dispositive motions due within 60 days of completion of the Administrative Record

II. DISCOVERY

Polymer80, Inc., and the Defendants to this action submitted a Joint Report Regarding Contents of Scheduling Order in the related case of *Polymer80, Inc. v. Garland, et al.*, No. 4:23-cv-00029-O (Doc. 32). In that report, the parties stated that they “anticipate that the merits of Plaintiff’s claims will be resolved based on the administrative record and that fact discovery and expert discovery will not be necessary.” (*Id.* at 3 ¶ 5). The Court thus **ORDERS** that neither Polymer80 nor Defendants shall take fact or expert discovery in this action. The parties may, however, move to amend the Scheduling Order at any time for good cause shown and may move to supplement the administrative record by demonstrating unusual circumstances justifying such supplementation within 21 days of the lodging of the administrative record.

SO ORDERED this [date]

Reed O'Connor
United States District Judge